

To the Commission:

I respectfully agree with the petitioners that certain baseline standards for single-sideband (SSB) emissions are necessary. There are now five channels in the 5 MHz band for use by amateur radio operators, and the FCC explicitly requires that amateurs contain their SSB telephony emissions to within a certain bandwidth while on those channels. Accordingly, there is now precedent for what the Petitioners seek, a 2.8 kHz bandwidth definition for SSB telephony within the amateur radio service. With this precedent, the FCC seems pretty clear about what it considers good engineering or good operating practice with respect to SSB emissions.

In contrast, I would disagree with the Petitioners that a 5.6 kHz bandwidth limit on double-sideband (DSB) telephony emissions is necessary. First, there are no recent FCC rulemaking proceedings to stand as a regulatory precedent for the creation of a limited bandwidth for DSB transmissions. Moreover, the 5.6 kHz bandwidth limit for DSB transmissions seems arbitrarily narrow in that many DSB transmissions occupy a slightly greater bandwidth of 6 kHz. In fact, existing FCC Regulations in Part 2 of Title 47, CFR, gives 6 kHz as the appropriate bandwidth for DSB "Commercial Quality" telephony. [(47 CFR 2.202(g), Table 2.] Second, setting the DSB telephony emission bandwidth to precisely twice the SSB telephony emission is electronically inappropriate. The kind of SSB telephony which is contained within 2.8 kHz is suppressed carrier SSB. If one reviews 47 CFR 2.202(g), Table 2, it shows that full carrier SSB has a bandwidth of 3.00 kHz, which is slightly wider. DSB telephony has a carrier, and therefore, would occupy approximately twice the bandwidth of a SSB telephony emission that also has a carrier, or in other words: twice 3.00 kHz instead of twice 2.80 kHz. For these reasons, it is good engineering and operating practice for amateur radio operators to use DSB telephone that has a 6.00 kHz bandwidth. Accordingly, while I support the grant of the Petition for Rulemaking with respect to the bandwidth standards for suppressed carrier SSB telephony, I believe that so much of the Petition for Rulemaking regarding the restriction of DSB telephony to a bandwidth of 5.8 kHz should be denied.

Respectfully Submitted:

/s./ James E. Whedbee, N0ECN
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General Class Operator